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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11 (Lead Case) (Jointly Administered)

**DEBTORS' STATEMENT WITH RESPECT TO
MOTION TO EXPUNGE CLASS PROOF OF
CLAIM FILED BY GER HOSPITALITY, LLC**

Related Docket Nos. 6438, 6675

Date: April 29, 2020
Time: 10:00 a.m. (Prevailing Pacific Time)
Place: Telephonic Hearing

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in
2 possession (collectively, “PG&E” or the “Debtors”) in the above-captioned chapter 11 cases
3 (the “Chapter 11 Cases”), hereby file this Statement (the “Statement”) with respect to the *Motion*
4 *to Expunge Class Proof of Claim Filed by GER Hospitality, LLC*, [Docket No. 6438] (as may be
5 amended by Docket No. 6675, the “Motion”) filed by certain victims of the Camp Fires and the
6 2017 North Bay Fires.

7 The Debtors note that, as of the date hereof, GER Hospitality, LLC (“GER”) has not sought
8 authority from the Court to have any claim that it has filed in the Chapter 11 Cases allowed as a
9 class claim pursuant to Bankruptcy Rule 7023. However, to the extent GER would seek to have
10 any such claim allowed as a class claim in these cases, for the reasons stated in the Motion and for
11 all the reasons previously set forth by the Debtors in response to prior requests by other claimants
12 that sought Court authority to allow class proofs of claim in these Chapter 11 Cases [Docket Nos.
13 4684 and 5369], the Debtors oppose such relief.

14 The Debtors reserve all rights to be heard before the Court in connection with the Motion
15 (and any joinders thereto); to amend, supplement, or otherwise modify this Statement prior to and
16 during the hearing on the Motion; and to assert such other and further objections to any and all
17 claims.

18 Dated: April 15, 2020

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20 **WEIL, GOTSHAL & MANGES LLP**
21 **KELLER BENVENUTTI KIM LLP**

22 /s/ Stephen Karotkin
23 Stephen Karotkin

24 *Attorneys for Debtors and Debtors in Possession*
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